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FEDERAL ELECTION
COMMISSION MAIL ROOM

JUL 15 11 10 AM '99

July 9, 1999

Lucy J. Denny, Reports Analyst
Federal Election Commission
999 E. Street N.W.
Washington, D.C. 20463

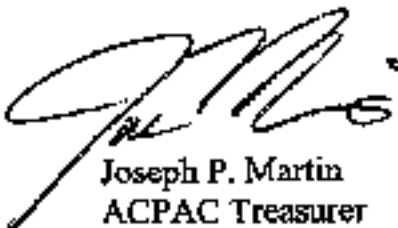
Dear Lucy Denny:

Enclosed you should find:

1. A letter sent to your attention, dated February 3, from former ACPAC Treasurer Paul Williams explaining contributions to Senator Alphonse D'Amato's general re-election campaign. I assume this problem has been cleared up since I have not received any further correspondence on the matter. If a problem still exists, please contact me immediately at (612) 928-8000 ext.105.
2. An amended report covering November 24, 1998 to December 31, 1998. Mr. Williams informed me of the \$379.03 discrepancy in ACPAC's prior FEC reports (see page 3 of the February 3 letter.) The attached amended report reflects the correct totals and coincides with ACPAC's January 1, 1999 to June 30, 1999 report.
3. January 1, 1999 to June 30, 1999 Mid-Year Report.

If you should have any further questions or concerns, don't hesitate to contact me at (612) 928-8000 ext.105.

Sincerely,



Joseph P. Martin
ACPAC Treasurer

ACA's Political Action Committee

A copy of our report is filed with the Federal Election Commission and is available for purchase from the FEC, Washington, D.C. 20463

Mailing Address: American Collectors Association, Inc. • P.O. Box 39106 • Minneapolis, MN 55439-0106 • Tel. (612) 926-6547 • Fax (612) 926-1624



February 3, 1999

Lucy J. Denny
Reports Analyst
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Dear Lucy Denny:

This letter is in response to your inquiry of January 20, 1999 regarding possible excessive contributions made to Sen. Alphonse D' Amato's general re-election campaign by the American Collectors Association political action committee. As we discussed on the phone last week, I believe that the discrepancy was the result of typographical errors and a misunderstanding of the tallying regulations for candidate contributions.

When I started serving as ACPAC treasurer a few years ago, I was under the impression that campaign disbursements for re-election campaigns can be designated on the FEC report as being for re-election campaign, without specifying whether such a designation should be tallied for a general or primary election. Such a designation would be the same as tallying the check to the nearest election. As I have since learned, this "shorthand" policy only leads to confusion as to how the check should be tallied. This was not a problem in the past, as ACPAC rarely contributed more than \$4,000 to any one candidate, but the possibility of confusion over how to tally contributions will certainly increase as ACPAC continues to grow. Fortunately, we have just purchased a Capitol Hill PAC software program which forces the preparer of the FEC reports to designate whether a contribution is for a general or primary election. The software also flags any violation of campaign laws before a report is filed or a disbursement check is written. I believe that this system will help reduce the typographical errors that have occasionally occurred during our former system of writing all reports in long-hand and then typing up the reports. With this background in place, I believe I can discuss all contributions made to Sen. Alphonse D' Amato over the past five years and answer the questions you raised in your inquiry.

1. ACPAC's first contribution to Sen. Alphonse D' Amato during the past five years occurred on February 23, 1993. The contribution was made for \$1,000 and was designated on the check for the "1992 elections." A similar designation was made on the FEC report. Consequently, this contribution did not count for the 1998 election totals.

ACA's Political Action Committee

A copy of our report is filed with the Federal Election Commission and is available for purchase from the FEC, Washington, D.C. 20463

2. The first contribution for Sen. D'Amato's 1998 re-election was made on May 11, 1994. The check was for \$1,000 and the contribution on the check was designated as 1998 re-election and the designation on the FEC report was listed as re-election. It should be tallied to the primary election, leaving a total of \$1,000 tallied to the primary election at that time.
3. The next disbursement to his campaign was made on June 27, 1995 for \$1,000. The designation on the check was for the 1998 re-election and was marked on the FEC report as other: 1998 re-election. This should be tallied to the primary election, leaving a total of \$2,000 tallied to the primary election at that time.
4. On November 30, 1995, a contribution of \$2,000 was made to Sen. D'Amato's campaign. This time, however, the contribution was tallied to the general election, leaving a total of \$2,000 tallied to the primary election and \$2,000 to the general election at that time.
5. On April 26, 1996, a contribution of \$1,000 was made to Sen. D'Amato's re-election campaign. The check was designated to the "re-election campaign," but unfortunately was designated as a "general election" on the FEC report, instead of the primary election designation. (A corrected report is enclosed.) This leaves a total of \$3,000 designated for the primary election and \$2,000 for the general election at that time.
6. The next contribution occurred on November 27, 1996 for \$1,000. This contribution should be tallied as a primary election, but was tallied on the FEC report as a general election. (A corrected report is enclosed.) This leaves a total of \$4,000 designated for the primary election and \$2,000 for the general election at that time.
7. The next disbursement date was April 8, 1998 for a contribution of \$1,000. The contribution was designated on the check as being for the 1998 Primary Election, but was listed on the FEC report as being for the 1998 General Election. (A corrected report is enclosed.). This leaves a total of \$5,000 designated for the primary election and \$2,000 for the general election.)
8. The final contribution was made on July 22, 1998 for \$3,000. The designation on the check was for the 1998 General Re-election and it was correctly tallied on the FEC report for the general election. This leaves a total contribution of \$5,000 for the primary election and \$5,000 for the general election.

Shortly after the July 22, 1998 check was received by the D'Amato fundraising committee, their treasurer contacted me with questions about how the disbursements should be tallied since I did not explicitly indicate how the checks should be tallied on two letters to her. I explained

February 3, 1999

how the contributions should be tallied. I presumed that everything made sense since I did not hear again from the campaign.

If at this time, you believe that I should notify the recipient and request a refund, I would certainly be glad to do so. (In the meantime, I have sent the campaign treasurer a letter explaining how the contributions should be re-tallied. (See attachment.)

First, effectively immediately, Joe Martin will be the new ACPAC treasurer and all correspondence should be directed to him.

The second issue relates to the previous statement. When I became ACPAC treasurer in 1994, I was informed that there was a discrepancy of \$379.03 between the amount reported to the FEC and the actual bank statement. The previous treasurer was unsure where the discrepancy came from and simply instructed me to carry the discrepancy forward as she had done. I should have contacted your office directly at that time, but I simply carried the discrepancy forward. Now that I am leaving as ACPAC treasurer, I would like to resolve this discrepancy as soon as possible for the new treasurer.

After considerable research, I believe I have discovered the origin of the discrepancy. As far as I can tell, this discrepancy was created on November 20, 1987, when Elizabeth Uppman, who served as ACPAC Treasurer at that time, transferred \$18,000 from the ACPAC checking account to a Fidelity U.S. Government Reserve Account which earned interest. On September 14, 1988, the total balance plus interest (\$21, 817.00) was transferred back into the ACPAC checking account. ACPAC then paid federal and state taxes on the interest with a check from the ACPAC campaign contribution fund, but apparently did not disclose the full amount to the FEC report. Consequently, we have consistently reported \$379.03 more to the FEC than what we have in our actual bank account.

ACA's Federal Legislative Consultant Robert Royer discussed this discrepancy with Mr. Richard Ng on February 2 and Mr. Ng suggested that we prepare an updated FEC report with the correct information, and to check with you to see if there are additional paperwork requirements that must be met. Since Bob Royer discussed this issue with Mr. Ng after the 1998 year end FEC report was filed, the report (which you should have already received) does not reflect the discrepancy discussed above. I will wait to hear from you before I file an amended 1998 year end report to ensure that I have completed all the necessary paperwork. This amended report will be filed using our traditional method of typing out the reports, since we cannot use the Capitol Hill PAC software system, until I hear from you on how to handle this discrepancy.

February 3, 1999

To reduce the possibility of further FEC inquiries or questions, I would appreciate it if you could send any information on upcoming seminars on FEC requirements to Joe Martin, so that he can be fully aware of and compliant with all FEC rules and regulations regarding political action committees.

Thank you for your time and interest in resolving this issue.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Paul Williams', with a long, sweeping horizontal stroke extending to the right.

Paul Williams

ACPAC Treasurer

Enc.

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

JUN 15 11 10 AM '99

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) American Collectors Association, Inc./ACPAC		2. FEC IDENTIFICATION NUMBER C00034785
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 4040 West 70th St.		
CITY, STATE and ZIP CODE Minneapolis, MN 55435		
		3. <input checked="" type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☒ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment?

☒ YES ☐ NO

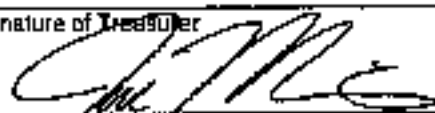
SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>11/24/98</u> through <u>12/31/98</u>		
6. (a) Cash on Hand January 1, 19 <u>98</u>			\$ 66,614.57
(b) Cash on Hand at Beginning of Reporting Period		\$ 115,766.36	
(c) Total Receipts (from Line 19)		\$ 1,510.00	\$ 73,173.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 117,276.36	\$ 139,787.57
7. Total Disbursements (from Line 30)		\$ 81.20	\$ 22,592.41
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 117,195.16	\$ 117,195.16
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Joseph P. Martin

Signature of Treasurer



Date

6/23/99

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X

(revised 9/93)

DETAILED SUMMARY PAGE

OF RECEIPTS AND DISBURSEMENTS

PAGE 2, FEC FORM 3X

[revised 1/1/91]

NAME OF COMMITTEE		REPORT COVERING PERIOD	
American Collectors Association, Inc./ACPAC		FROM 11/24/98	TO: 12/31/98
		COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts			
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committees			
i. Itemized (use Schedule A)	\$ 900.00	\$46,562.00	110
ii. Unitemized	610.00	22,185.00	111
iii. Total (add i and ii) >	1,510.00	68,847.00	112
b. Political Party Committees	0.00	0.00	113
c. Other Political Committees (such as PACs)	0.00	0.00	114
d. Total Contributions (add a iii, b and c) >	1,510.00	68,847.00	115
12. Transfers From Affiliated/Other Party Committees	0.00	0.00	12
13. All Loans Received	0.00	0.00	13
14. Loan Repayments Received	0.00	0.00	14
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)	0.00	0.00	15
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees	0.00	0.00	16
17. Other Federal Receipts (Dividends, Interest, etc.) PIK (Itemized & Unitemized)	0.00	4,326.00	17
18. Transfers from Nonfederal Account for Joint Activity	0.00	0.00	18
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >	1,510.00	73,173.00	19
20. Total Federal Receipts (subtract line 18 from line 19) >	1,510.00	73,173.00	20
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share	0.00	0.00	21
ii. Non-Federal Share	0.00	0.00	21
b. Other Federal Operating Expenditures	81.20	1,266.41	21
c. Total Operating Expenditures (add a i, a ii, and b) >	81.20	1,266.41	21
22. Transfers to Affiliated/Other Party Committees	0.00	0.00	22
23. Contributions to Federal Candidates/Committees and Other Political Committees	0.00	17,000.00	23
24. Independent Expenditures (use Schedule E)	0.00	0.00	24
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)	0.00	0.00	25
26. Loan Repayments Made	0.00	0.00	26
27. Loans Made	0.00	0.00	27
28. Refunds of Contributions To:			
a. Individual/Persons Other Than Political Committees	0.00	0.00	28
b. Political Party Committees	0.00	0.00	28
c. Other Political Committees (such as PACs)	0.00	0.00	28
d. Total Contribution Refunds (add a, b and c) >	0.00	0.00	28
29. Other Disbursements PIK (Itemized & Unitemized)	0.00	4,326.00	29
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	81.20	22,592.41	30
31. Total Federal Disbursements (subtract line 21 a ii from line 30) >	81.20	22,592.41	31
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans) (from line 11d)	1,510.00	68,847.00	32
33. Total Contribution Refunds (from line 28d)	0.00	0.00	33
34. Net Contributions (other than loans) (subtract line 33 from line 32)	1,510.00	68,847.00	34
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >	81.20	1,266.41	35
36. Offsets to Operating Expenditures (from line 15)	0.00	0.00	36
37. Net Operating Expenditures (subtract line 36 from line 35) >	81.20	1,266.41	37

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 11a.i.

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American Collectors Association, Inc./ACPAC

A. Full Name, Mailing Address and ZIP Code William Burns 40 West Ave. Rochester, NY 14611	Name of Employer Mercantile Adjustment Bureau	Date (month, day, year) 12/29/98	Amount of Each Receipt this Period \$250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Debt Collector	Aggregate Year-to-Date > \$ 250.00	
B. Full Name, Mailing Address and ZIP Code Porter Morgan III 7105 Brentwood Ave. Oklahoma City, OK 73116	Name of Employer CAC Financial Corp.	Date (month, day, year) 12/29/98	Amount of Each Receipt this Period \$250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Debt Collector	Aggregate Year-to-Date > \$ 350.00	
C. Full Name, Mailing Address and ZIP Code David Rosenberg 15 E. Ridge Pike Suite 3 Conshohocken, PA 19428	Name of Employer Interstate Credit and Collection, Inc.	Date (month, day, year) 12/29/98	Amount of Each Receipt this Period \$200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Debt Collector	Aggregate Year-to-Date > \$ 200.00	
D. Full Name, Mailing Address and ZIP Code David & Connie Shields 826 Stevens Creek Ct. Forsyth, IL 62535	Name of Employer Midwest Credit & Collection, Inc.	Date (month, day, year) 12/29/98	Amount of Each Receipt this Period \$200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Debt Collector	Aggregate Year-to-Date > \$ 200.00	
E. Full Name, Mailing Address and ZIP Code 	Name of Employer 	Date (month, day, year) 	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation 	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code 	Name of Employer 	Date (month, day, year) 	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation 	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code 	Name of Employer 	Date (month, day, year) 	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation 	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)

\$900.00

TOTAL This Period (last page this line number only)

\$900.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
for each category of the
Detailed Summary Page

 PAGE 1 OF 1
FOR LINE NUMBER
21b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American Collectors Association, Inc./ACPAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FBS Card Services 515 Marquette Ave. Minneapolis, MN 55402	Visa Service Charge Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/30/98 \$40.00	
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/01/98 \$41.20	\$81.20
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$81.20

TOTAL This Period (last page this line number only)

\$81.20

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER
21b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

American Collectors Association, Inc./ACPAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FBS Card Services 515 Marquette Ave. Minneapolis, MN 55402	Visa Service Charge Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/30/98 \$40.00	
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/01/98 \$81.20	\$81.20
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$81.20

TOTAL This Period (last page this line number only)

\$81.20

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

☐ Hand Delivered Date of Receipt

☐ First Class Mail POSTMARKED

☒ Registered/Certified Mail POSTMARKED

7-18-99

☐ No Postmark

☐ Postmark Illegible

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Records Date of Receipt

☐ Other (Specify): Postmarked
and/or Date of Receipt

☐ Electronic Filing

Jm13
PREPARER

7-15-99
DATE PREPARED